



**U.S. Department of Justice**

**Criminal Division**

VAA:WHG;JEC:JHF:jmf

*Office of International Affairs*

*Washington, D.C. 20530*

September 25, 2018

VIA E-MAIL AND FEDEX

Sen. The Hon. Kathy L. Simmons, JP  
Attorney-General & Minister of Legal Affairs  
Attorney General's Chambers  
Global House  
43 Church Street  
Hamilton HM12  
Bermuda

Re: Supplemental request for Assistance in the Investigation of Robert Brockman, et al.; OIA Reference Number: CRM-182-63227 (please use when responding)

Dear Attorney General Simmons:

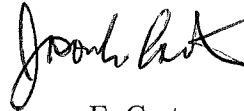
On April 30, 2018, we submitted to the Central Authority of Bermuda a request pursuant to the Treaty between the Government of the United States of America and the Government of Bermuda on Mutual Legal Assistance in Criminal Matters, seeking official records, business records, and bank records for the years 2000-2014, related to the investigation of Robert Brockman, Evatt Tamine, and others. These individuals appear to have been involved in a sophisticated scheme to defraud the United States government and evade the assessment and payment of federal income taxes. On June 1, 2018, we submitted a supplemental request, expanding the time frame for which we seek records up to, and including, the date of that letter.

U.S. authorities have now learned that the Bermuda Police Service (BPS) executed a search warrant on September 5, 2018, at the residence of Evatt Tamine, located at 2 Hidden Lane, Pembroke, Bermuda. We understand that the BPS is investigating Mr. Tamine in connection with possible money laundering and criminal tax evasion contrary to Section 37 of the Tax Management Act, as read with the Proceeds of Crime Act 1997 (amended). It also is our understanding that officers seized a tremendous volume of documents and electronic evidence that may include business and financial records, correspondence, and other evidence related to the individuals and entities detailed in our April 30, 2018, request for assistance concerning the scheme to defraud the United States government. Thus, we are now seeking copies of the documents and any electronic evidence seized by Bermuda authorities pursuant to that search, as well as any investigative reports prepared by Bermuda authorities that may be relevant to the

U.S. investigation. In addition, we have attached a Chain of Custody form to be completed with respect to the electronic evidence that was seized.

We thank you for your assistance in the matter, and we ask that you keep us apprised of all developments. If you have any questions concerning this investigation, please do not hesitate to contact OIA Senior Trial Attorney Judith Friedman at (202) 514-0951 or [Judith.Friedman2@usdoj.gov](mailto:Judith.Friedman2@usdoj.gov), or International Affairs Specialist Jason Fischer, at (202) 305-1995 or [Jason.Fischer@usdoj.gov](mailto:Jason.Fischer@usdoj.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason E. Carter", with a long horizontal line extending from the end of the signature.

Jason E. Carter  
Associate Director  
Office of International Affairs  
Criminal Division

CHAIN OF CUSTODY

I, the undersigned, \_\_\_\_\_,

(Name)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(Title or Function)

attest on penalty of criminal punishment for false statements or attestation that I:

–took possession of the samples listed below from \_\_\_\_\_

(Person)

on \_\_\_\_\_, at \_\_\_\_\_.

(Date)

(Place)

Description of samples:

I declare that I relinquished custody of those samples on \_\_\_\_\_,

(Date)

at \_\_\_\_\_ to: \_\_\_\_\_

(Place)

(Name)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(Title or Function)

I declare that, while they were in my custody, these articles were:

–in no way altered. (\*)

–altered in the following manner: (\*)

Done this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_

(Place)

(Signature)

(\*) cross out the inapplicable statements